

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LISA STOUT, individually and the marital
community composed of Lisa and Ray C.
Stout,

Plaintiff,

v.

UNITED AIR LINES, INC.,

Defendant.

CASE No. CV07-0682 JCC

**DEFENDANT UNITED AIR LINES,
INC.'S INITIAL DISCLOSURES**

Defendant United Air Lines, Inc. ("United"), through its counsel, makes the following initial disclosures pursuant to FED. R. CIV. P. 26(a)(1). United makes the following initial disclosures based on the information reasonably available to United. United reserves the right to supplement these initial disclosures based on information or evidence discovered, offered, or introduced.

I. WITNESSES

Pursuant to FED. R. CIV. P. 26(a)(1)(A), United identifies, and reserves the right to call at trial, the following witnesses who may have discoverable information that United may use in support of its claims and defenses in this matter:

DEFENDANT UNITED AIR LINES, INC.'S
INITIAL DISCLOSURES - 1
CASE NO. 07-0682JCC

DLA Piper US LLP
701 Fifth Avenue, Suite 7000
Seattle, WA 98104-7044 | Tel: 206.839.4800

EXHIBIT C

1 1. **Ms. Jane Allen**
2 c/o Stellman Keehnel
3 DLA Piper US LLP
4 701 Fifth Avenue, Suite 7000
 Seattle, WA 98104-7044
 Telephone: 206.839.4800

5 Jane Allen is Senior Vice President of United's Human Resources Department.
6 Ms. Allen may have relevant knowledge and information regarding United's policies,
7 procedures, handbook sections, rules of conduct, training programs, and actions regarding and
8 prohibiting hostile working environments and workplace discrimination or harassment.
9 Ms. Allen may also have relevant knowledge and information regarding United's actions
10 toward preventing and prohibiting inappropriate material in the workplace.

11 2. **Capt. Patrick Durgan**
12 c/o Stellman Keehnel
13 DLA Piper US LLP
14 701 Fifth Avenue, Suite 7000
 Seattle, WA 98104-7044
 Telephone: 206.839.4800

15 Capt. Durgan was Chief Pilot for United's Flight Operations in Seattle, Washington
16 during the relevant time period. Capt. Durgan may have relevant knowledge and information
17 regarding Mrs. Stout's employment at United, including but not limited to Mrs. Stout's work
18 history, conduct, training, compensation, bonuses, evaluations, performance, and fitness for
19 flight duty. Capt. Durgan may also have relevant knowledge and information regarding
20 United's policies, procedures, handbook sections, rules of conduct, training programs, and
21 actions regarding and prohibiting hostile working environments and workplace
22 discrimination or harassment. Capt. Durgan may also have relevant knowledge and
23 information regarding United's actions toward preventing and prohibiting inappropriate
24 material in the workplace.

1 3. **Ms. Sheryl Hinkle**
2 c/o Stellman Keehnel
3 DLA Piper US LLP
4 701 Fifth Avenue, Suite 7000
 Seattle, WA 98104-7044
 Telephone: 206.839.4800

5 Ms. Hinkle is Senior Staff Representative in United's Human Resources Department.
6 Ms. Hinkle may have relevant knowledge and information regarding United's policies,
7 procedures, handbook sections, rules of conduct, training programs, and actions regarding and
8 prohibiting hostile working environments and workplace discrimination or harassment.
9 Ms. Hinkle may also have relevant knowledge and information regarding United's actions
10 toward preventing and prohibiting inappropriate material in the workplace. Ms. Hinkle may
11 also have relevant knowledge and information regarding Mrs. Stout's employment at United,
12 reports or complaints by Mrs. Stout, and United's investigations, actions, and responses
13 regarding such reports or complaints.

14 4. **Dr. Gary M. Kohn, MD**
15 c/o Stellman Keehnel
16 DLA Piper US LLP
17 701 Fifth Avenue, Suite 7000
 Seattle, WA 98104-7044
 Telephone: 206.839.4800

18 Dr. Kohn was the Corporate Medical Director for United during the relevant time
19 period. Dr. Kohn may have relevant knowledge and information regarding pilots' medical
20 certifications for fitness for flight duty, medical grounding status, and applications for medical
21 grounding and pilot disability benefits, including but not limited to Mrs. Stout's application for
22 medical grounding and pilot disability benefits.

- 1 5. **Mr. Bill Norman**
2 c/o Stellman Keehnel
3 DLA Piper US LLP
4 701 Fifth Avenue, Suite 7000
5 Seattle, WA 98104-7044
6 Telephone: 206.839.4800

7 Mr. Norman is Senior Vice President — United Services for United. Mr. Norman may
8 have relevant knowledge and information regarding United's actions toward preventing and
9 prohibiting inappropriate material in the workplace, including but not limited to Maintenance
10 Operations' role in that effort.

- 11 6. **Flight Officer Ryan G. Richey**
12 c/o Stellman Keehnel
13 DLA Piper US LLP
14 701 Fifth Avenue, Suite 7000
15 Seattle, WA 98104-7044
16 Telephone: 206.839.4800

17 Mr. Richey was a United Flight Officer during the relevant time period and was First
18 Officer on several flights piloted by Mrs. Stout. Mr. Richey may have relevant knowledge and
19 information regarding Mrs. Stout's workplace conduct, including but not limited to
20 Mrs. Stout's performance and conduct during and relating to the flights piloted by Mrs. Stout
21 for which Mr. Richey served as First Officer.

- 22 7. **United Flight Officer(s) Who Flew With Mrs. Stout**
23 [ADDRESS AND PHONE NUMBER CURRENTLY UNKNOWN]

24 United Flight Officer(s) who flew with Mrs. Stout, who Mrs. Stout is aware of, may
25 have relevant knowledge and information regarding Mrs. Stout's workplace conduct, including
26 but not limited to Mrs. Stout's performance and conduct during and relating to the flights that
27 such Flight Officer(s) flew with Mrs. Stout.

1 8. **Ms. Linda Brunner Ross**
2 c/o Stellman Keehnel
3 DLA Piper US LLP
4 701 Fifth Avenue, Suite 7000
 Seattle, WA 98104-7044
 Telephone: 206.839.4800

5 Ms. Brunner Ross is Senior Staff Representative in United's Human Resources
6 Department and is involved in United's compliance with federal EEO laws. Ms. Brunner Ross
7 may have relevant knowledge and information regarding United's policies, procedures,
8 handbook sections, rules of conduct, training programs, and actions regarding and prohibiting
9 hostile working environments and workplace discrimination or harassment. Ms. Brunner Ross
10 may also have relevant knowledge and information regarding United's actions toward
11 preventing and prohibiting inappropriate material in the workplace. Ms. Brunner Ross may
12 also have relevant knowledge and information regarding reports or complaints by Mrs. Stout
13 and United's investigations, actions, and responses regarding such reports or complaints.

14 9. **Capt. James "J.R." Russell**
15 c/o Stellman Keehnel
16 DLA Piper US LLP
17 701 Fifth Avenue, Suite 7000
 Seattle, WA 98104-7044
 Telephone: 206.839.4800

18 Capt. Russell was Chief Pilot for United's Flight Operations in Denver, Colorado
19 during the relevant time period. Capt. Russell may have relevant knowledge and information
20 regarding Mrs. Stout's employment at United, including but not limited to Mrs. Stout's work
21 history, conduct, training, compensation, bonuses, evaluations, performance, and fitness for
22 flight duty. Capt. Russell may also have relevant knowledge and information regarding
23 United's policies, procedures, handbook sections, rules of conduct, training programs, and
24 actions regarding and prohibiting hostile working environments and workplace discrimination
25 or harassment. Capt. Russell may also have relevant knowledge and information regarding
26 United's actions toward preventing and prohibiting inappropriate material in the workplace.

1 Capt. Russell may also have relevant knowledge and information regarding reports or
2 complaints by Mrs. Stout regarding the Denver Flight Operations center and United's
3 investigations, actions, and responses regarding such reports or complaints.

4 10. **Capt. Mark Sebbby**
5 c/o Stellman Keehnel
6 DLA Piper US LLP
7 701 Fifth Avenue, Suite 7000
8 Seattle, WA 98104-7044
9 Telephone: 206.839.4800

8 Capt. Sebbby was Manager Line Operations during the relevant time period and may
9 have relevant knowledge and information regarding United's policies, procedures, handbook
10 sections, rules of conduct, training programs, and actions regarding and prohibiting hostile
11 working environments and workplace discrimination or harassment. Capt. Sebbby may also
12 have relevant knowledge and information regarding United's actions toward preventing and
13 prohibiting inappropriate material in the workplace.

14 11. **Ms. Pamela Sylvain**
15 c/o Stellman Keehnel
16 DLA Piper US LLP
17 701 Fifth Avenue, Suite 7000
18 Seattle, WA 98104-7044
19 Telephone: 206.839.4800

18 Ms. Pamela Sylvain is Coordinator — Maintenance Operations Support for United.
19 Ms. Sylvain may have relevant knowledge and information regarding United's actions toward
20 preventing and prohibiting inappropriate material in the workplace, including but not limited to
21 Maintenance Operations' role in that effort.

22 12. **Capt. Daniel Waingrow**
23 c/o Stellman Keehnel
24 DLA Piper US LLP
25 701 Fifth Avenue, Suite 7000
26 Seattle, WA 98104-7044
Telephone: 206.839.4800

1 Capt. Waingrow was Flight Manager and Line Pilot for United's Flight Operations in
2 Seattle, Washington during the relevant time period. Capt. Waingrow may have relevant
3 knowledge and information regarding Mrs. Stout's employment at United, including but not
4 limited to Mrs. Stout's work history, conduct, training, compensation, bonuses, evaluations,
5 performance, and fitness for flight duty. Capt. Waingrow may also have relevant knowledge
6 and information regarding United's policies, procedures, handbook sections, rules of conduct,
7 training programs, and actions regarding and prohibiting hostile working environments and
8 workplace discrimination or harassment.

9 13. **Capt. Ulrika Walliter**
10 c/o Stellman Keehnel
11 DLA Piper US LLP
12 701 Fifth Avenue, Suite 7000
13 Seattle, WA 98104-7044
14 Telephone: 206.839.4800

15 Capt. Walliter is Assistant Chief Pilot for United's Flight Operations in Seattle,
16 Washington. Capt. Walliter may have relevant knowledge and information regarding
17 Mrs. Stout's employment at United, including but not limited to Mrs. Stout's work history,
18 conduct, training, compensation, bonuses, evaluations, performance, and fitness for flight duty.
19 Capt. Walliter may also have relevant knowledge and information regarding United's policies,
20 procedures, handbook sections, rules of conduct, training programs, and actions regarding and
21 prohibiting hostile working environments and workplace discrimination or harassment.
22 Capt. Walliter may also have relevant knowledge and information regarding United's actions
23 toward preventing and prohibiting inappropriate material in the workplace. Capt. Walliter may
24 also have relevant knowledge and information regarding reports or complaints by Mrs. Stout
25 and United's investigations, actions, and responses regarding such reports or complaints.
26

1 14. **Dr. W. Michael Waring, MD, MPH, FACOEM**
2 c/o Stelman Keehnel
3 DLA Piper US LLP
4 701 Fifth Avenue, Suite 7000
5 Seattle, WA 98104-7044
6 Telephone: 206.839.4800

7 Dr. Waring was Regional Flight Surgeon in the Medical Department for United's Flight
8 Operations in Seattle, Washington during the relevant time period. Dr. Waring may have
9 relevant knowledge and information regarding pilots' medical certifications for fitness for
10 flight duty, medical grounding status, and applications for medical grounding and pilot
11 disability benefits, including but not limited to Mrs. Stout's application for medical grounding
12 and pilot disability benefits.

13 By identifying the subjects on which the above witnesses may have knowledge, United
14 makes no representation that such witnesses do not have additional potentially relevant
15 knowledge and information, and United does not waive its right to seek testimony from such
16 witnesses on other subjects.

17 United reserves the right to call or rely on any witnesses identified by Plaintiff.

18 There may be other past and present employees of United, who may have knowledge of
19 facts that United may ultimately rely on in support of its defenses. United reserves the right to
20 identify additional witnesses who may become necessary to support its defenses.

21 **II. DOCUMENTS**

22 United may, and reserves the right to, rely on the following categories of documents:

23 A. Lisa Stout's United employment files, including but not limited to any
24 documents and information relating to Mrs. Stout's (1) personnel file; (2) medical file; (3)
25 training file; (4) job titles and positions; (5) salary, raises, bonuses, deductions in pay,
26 disciplinary measures, evaluations, performance, health, and medical grounding status; (6)
27 reports or complaints to colleagues or superiors regarding materials of a sexual nature in the

6/30/08

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community composed of Lisa and Ray C.
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UNITED AIR LINES, INC.,

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CASE No. CV07-0682 JCC

**DEFENDANT UNITED AIR LINES,
INC.'S SUPPLEMENTAL
DISCLOSURES**

Defendant United Air Lines, Inc. ("United"), through its counsel, makes the following supplemental disclosures pursuant to FED. R. CIV. P. 26(a). United makes the following supplemental disclosures based on the information reasonably available to United. United reserves the right to supplement these disclosures based on information or evidence discovered, offered, or introduced.

I. WITNESSES

Pursuant to FED. R. CIV. P. 26(a)(1)(A), United identifies, and reserves the right to call at trial, the following witnesses who may have discoverable information that United may use in support of its claims and defenses in this matter:

DEFENDANT UNITED AIR LINES, INC.'S
SUPPLEMENTAL DISCLOSURES - I
CASE NO. 07-0682JCC

DLA Piper US LLP
701 Fifth Avenue, Suite 7000
Seattle, WA 98104-7044 | Tel: 206.839.4800

1 16. **Capt. John Winter**
2 **c/o Stellman Keehnel**
3 **DLA Piper US LLP**
4 **701 Fifth Avenue, Suite 7000**
 Seattle, WA 98104-7044
 Telephone: 206.839.4800

5 Captain Winter was the System Chief Pilot for United Air Lines at the time of Capt.
6 Stout's complaints of pornography on the flight deck. He may have knowledge relevant to the
7 remedial actions considered and implemented by United in response to Capt. Stout's
8 complaints.

9 17. **Katherine Loveland**
10 **c/o Stellman Keehnel**
11 **DLA Piper US LLP**
12 **701 Fifth Avenue, Suite 7000**
 Seattle, WA 98104-7044
 Telephone: 206.839.4800

13 Ms. Loveland worked for United Air Lines on the Crew Desk in 2005 and attempted to
14 assign Capt. Stout a flight i.d. on June 4, 2005. Ms. Loveland may have relevant information
15 concerning the operations of United's Crew Desk, the circumstances of Capt. Stout's refusal to
16 accept a flight assignment Capt. Stout on June 4, 2005, and the reasons that Capt. Stout was
17 given an "ABN" (absent, no pay) for her refusal to accept a valid flight assignment.

18 18. **Capt. John Steiner**
19 **c/o Stellman Keehnel**
20 **DLA Piper US LLP**
21 **701 Fifth Avenue, Suite 7000**
22 **Seattle, WA 98104-7044**
 Telephone: 206.839.4800

23 Capt. Steiner was an instructor for a United fuel efficiency class in approximately
24 November 2004. He may have relevant knowledge concerning Capt. Stout's behavior in the
25 fuel efficiency class, reports of Capt. Stout's behavior to United management personnel
26 including Capt. Pat Durgan, and actions taken to address Capt. Stout's combative behavior.